

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

Central District

No. 4:18-cv-40009

D.M., et al.,	)	
PLAINTIFFS,	)	MOTON TO ENLARGE
	)	THE TIME FOR DELAWARE
v.	)	COUNTY, OHIO
	)	DEFENDANTS TO RESPOND
CYNTHIA DUNGEY,	)	
DAVID DOMBROWSKI,	)	
ASHLEY KELLER, and,	)	
LYNN STACY,	)	
DEFENDANTS.	)	

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Although Delaware County Defendants, David Dombrosky, Ashley Keller, and Lynn Stacey (hereinafter “Delaware County”) contend that the Court is without personal jurisdiction or venue and that proper service of process has not been achieved, Delaware County moves the court to grant a 10-day enlargement of time to respond to Plaintiffs’ Complaint. This will allow the Court to issue ECM/ECF access to the undersigned counsel.

Respectfully submitted,

Carol Hamilton O’Brien  
Delaware County Prosecuting Attorney

/s Andrew J. King  
Andrew J. King (Ohio Bar #0080206)  
(Counsel of Record, Admitted *Pro Hac Vice*)  
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I hereby certify that the above document was served upon the counsel for Defendant Cynthia Dungey and upon the Plaintiffs by first-class, pre-paid, United States mail this Thirteenth day of February, 2018, by forwarding copies to:

Heather and Adam May  
187 Ramshorn Rd.  
Dudley, MA 01571  
and

Assistant Attorney General  
Therese Hanna  
Ohio Attorney General's Office  
Health and Human Services Section  
30 East Broad Street 26th Floor  
Columbus, Ohio 43215.

Respectfully submitted,

Carol Hamilton O'Brien  
Delaware County Prosecuting Attorney

/s Andrew J. King  
Andrew J. King (Ohio Bar #0080206)  
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